

**GOTLIB LAW**

July 12, 2023

**Via ECF & Email**

The Honorable Robert W. Lehrburger  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007  
(Email: [Lehrburger\\_NYSDChambers@nysd.uscourts.gov](mailto:Lehrburger_NYSDChambers@nysd.uscourts.gov))

Request Granted.



Robert W. Lehrburger, USMJ  
July 12, 2023

Re: United States v. Gumucio, et al. (Haven Soliman), 22 MAG 6904 (RWL)

Dear Judge Lehrburger:

Carla Sanderson and I represent Haven Soliman in the above captioned case. I write, with the consent of the government and the U.S. Pretrial Services Office (“Pretrial”), to respectfully request that the terms of Ms. Soliman’s bond be temporarily modified to permit her to travel to Houston, Texas from July 26 through July 29, 2023.

Ms. Soliman was arrested on August 31, 2022 on a criminal complaint alleging criminal tax violations. Ms. Soliman was released on bond, on consent of the government, that same day. Ms. Soliman’s conditions of release include, among others, her travel restricted to the Southern and Eastern Districts of New York, the Western District of Washington, the District of Oregon, the District of Colorado, and points in between for travel to and from the permitted districts. Ms. Soliman has complied with all the conditions of her pretrial release to date.

The requested temporary travel modification would allow Ms. Soliman to attend the wedding of a close childhood friend. I have provided information regarding the details of Ms. Soliman’s travel to the government and Pretrial. The government (by Assistant U.S. Attorney Michael Neff) consents to this request as does Pretrial Officer Chandra Wageman.

Accordingly, we respectfully request that the Court modify the terms of Ms. Soliman’s pretrial release to permit her to travel to Houston, Texas from July 26 through July 29, 2023. I thank the Court for its consideration.

Respectfully submitted,

/s/

Valerie A. Gotlib

cc: Arraignment Clerks (via Email)  
Michael Neff, Assistant U.S. Attorney (via Email)  
Chandra Wageman, U.S. Pretrial Officer (via Email)